

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION  
81 Higuera Street, Suite 200  
San Luis Obispo, CA 93401-5427**

**CEASE AND DESIST ORDER NO. 98-13  
WDID No. 3 440102001**

**Requiring the**

**SANTA CRUZ COUNTY SANITATION DISTRICT  
to Cease Collection System Overflows  
with Time Schedule for Implementation of Measure  
to Improve the Collection System**

The Regional Water Quality Control Board, Central Coast Region (hereafter Board) finds:

1. The Board adopted Order 94-10, National Pollutant Discharge Elimination System Permit No. CA 0048194 (hereafter the NPDES permit), on February 11, 1994. The NPDES permit orders the Santa Cruz County Sanitation District (hereafter the Discharger) to comply with specific items of the "Standard Provisions and Reporting Requirements for National Pollutant Discharge Elimination System Permits" (hereafter Standard Provisions) dated January 1985. Standard Provision A.4 prohibits the bypass and overflow of untreated waste.
2. The Discharger is responsible for the adequate staffing and proper operation of the collection system to ensure permit compliance.
3. A Settlement Agreement was approved by the Board in response to Administrative Liability Complaint No. 97-13 for alleged bypass and overflow of untreated waste to surface waters. The bypass occurred on August 14, 1996, and approximately 30,000 gallons of untreated sewage discharged to surface waters. In the Settlement Agreement, the Discharger proposed an independent consultant would audit the collection system to evaluate the condition and adequacy of County operations and maintenance. The Settlement Agreement stipulated the audit would provide specific recommendations to improve collection system operation and maintenance and prevent spills and leaks.
4. During the audit, the consultant evaluated capacity, operating procedures, equipment, inventory, record keeping, staffing, training and coordination of County pump station and collection system operation and maintenance.
5. The independent audit report by Environmental Services in October 1997, described system and pump station problems that have resulted in excessive spills. The audit found the Discharger's response to spills occurring after normal work hours was inadequate, five pumping stations accounted for sixty percent of the spills, severe understaffing of operations and maintenance line crews, record keeping inaccuracies, and lack of coordination with other County departments. The audit recommended the Discharger implement measures which will reduce the likelihood of pump station overflows and spills from the collection system.
6. The Discharger reported 14 spills totaling 574,600 gallons during the months of November 1996, through January 1997.
7. On August 4, 1997, the Discharger reported a July 30, 1997 overflow of 33,000 gallons of untreated sewage from the Rodeo pump station to surface waters of Corcoran Lagoon and the Pacific Ocean.
8. The Discharger's continued violation of the NPDES permit from bypass and overflows threaten health and the environment.
9. This enforcement action is being taken for the protection of health and the environment and as such is exempt from the provisions of the

California Environmental Quality Act (Public Resources Code Section 21000, et. Seq.) in accordance with section 15321, chapter 3, title 14, California code of regulations.

**IT IS HEREBY ORDERED**, pursuant to Section 13301 of the California Water Code, the County of Santa Cruz Sanitation District, shall cease and desist violations resulting from the existing condition and operation of the sewage collection and transport system, as follows:

1. Forthwith, the Discharger shall cease and desist overflow from the collection system to surface waters contrary to Order No. 94-10.
2. The Discharger shall comply with the time schedule and perform tasks listed in Table 1 below as described in the independent audit report to improve collection system operation and maintenance and prevent spills and leaks in violation of Order No. 94-10

**Table 1**

Task	Compliance Date
The Discharger shall provide evidence of the following improvements: -Revised on-call system -Revised spill reduction plan for each pump station -Revised inflow and infiltration monitoring program -Revised manhole inspection and repair program -Revised record keeping program -Revised part inventory procedures program -Revised tracking system procedures -Revised emergency response plan for wet weather emergencies	March 31, 1998
The Discharger shall provide evidence of adequate staff and training each of the following crews: -Pump crew -Dig and repair -Line maintenance crew -Collection system surveillance crew -Instrumentation and control technicians The Discharger shall submit results of the following system analysis: -Video inspection of the collection system -System vulnerability analysis to determine critical locations	November 2, 1998
The Discharger shall complete the following capital improvement projects: -Repairs at the Moran Lake pump station -Repairs at Rodeo pump station -Repairs at Cassillas pump station -Permanent backup power at all critical pump stations -Triple redundancy alarms at all critical pump stations	November 1, 1999

FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY SUBJECT THE DISCHARGER TO FURTHER ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO, ASSESSMENT OF CIVIL LIABILITY UNDER SECTION 13385 OF THE WATER CODE AND REFERRAL OF THIS MATTER TO THE DISTRICT ATTORNEY OR ATTORNEY GENERAL FOR INJUNCTIVE RELIEF AND CIVIL OR CRIMINAL LIABILITY.

/S/Roger W. Briggs

Executive Officer